

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SCIELE PHARMA, INC.,)	
ANDRX CORPORATION, ANDRX)	
PHARMACEUTICALS, INC. (N/K/A)	
WATSON LABORATORIES, INC.-)	
FLORIDA), ANDRX PHARMACEUTICALS,)	C.A. No. 09-037 (RBK)(JS)
L.L.C., ANDRX LABORATORIES (NJ),)	CONSOLIDATED
INC., ANDRX EU LTD., AND ANDRX)	
LABS, L.L.C.,)	
)	PUBLIC VERSION - REDACTED
Plaintiffs,)	
)	
v.)	
)	
LUPIN LTD., and)	
LUPIN PHARMACEUTICALS, INC.,)	
)	
Defendants.)	

SHIONOGI PHARMA, INC.,)	
ANDRX CORPORATION, ANDRX)	
PHARMACEUTICALS, INC. (N/K/A)	
WATSON LABORATORIES, INC.-)	
FLORIDA), ANDRX PHARMACEUTICALS,)	
L.L.C., ANDRX LABORATORIES (NJ),)	
INC., ANDRX EU LTD., AND ANDRX)	C.A. No. 10-135 (RBK)(JS)
LABS, L.L.C.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
MYLAN, INC., and)	
MYLAN PHARMACEUTICALS INC.,)	
)	
Defendants.)	

**DECLARATION OF JENNIFER YING IN SUPPORT OF PLAINTIFFS' REPLY BRIEF
IN SUPPORT OF THEIR MOTION FOR A PROTECTIVE ORDER REGARDING
DEFENDANT LUPIN'S NOTICES OF DEPOSITIONS TO SHIONOGI AND ANDRX
PURSUANT TO FED. R. CIV. P. 30(b)(6)**

Original Filing Date: May 7, 2012

Redacted Filing Date: May 31, 2012

DECLARATION OF JENNIFER YING

1. I, Jennifer Ying, am an attorney with the law firm of Morris, Nichols, Arsht, and Tunnell LLP, and am one of the attorneys representing Plaintiff Sciele Pharma, Inc. n/k/a Shionogi Pharma, Inc. (“Shionogi”) in this action. I make this declaration based on my personal knowledge and in support of Plaintiffs’ Reply Brief In Support Of Their Motion For A Protective Order Regarding Defendant Lupin’s Notices Of Depositions To Shionogi And Andrx Pursuant To Fed. R. Civ. P. 30(B)(6).

2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiffs’ Supplemental Infringement Contentions Against the Lupin Defendants and accompanying exhibits served on February 29, 2012, **portions of which have been designated as “HIGHLY CONFIDENTIAL—OUTSIDE ATTORNEYS’ EYES ONLY.”**

3. Attached hereto as Exhibit 2 is a true and correct copy of Plaintiffs’ Response to Lupin’s Amended Invalidity Contentions served on March 20, 2012.

Executed this 7th day of May, 2012, at Wilmington, Delaware.

I declare the foregoing under penalty of perjury under the laws of the United States of America.

/s/ Jennifer Ying

Jennifer Ying

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